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Attorneys for Plaintiffs and the Certified Subclasses

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STACIA STINER; RALPH CARLSON, in his
 capacity as Trustee of the Beverly E. Carlson and
 Helen V. Carlson Joint Trust; LORESIA
 VALLETTE, in her capacity as representative of
 the Lawrence Quinlan Trust; MICHELE LYTLE,
 in her capacity as Trustee of the Boris Family
 Revocable Trust; RALPH SCHMIDT, by and
 through his Guardian Ad Litem, HEATHER
 FISHER; PATRICIA LINDSTROM, as successor-
 in-interest to the Estate of ARTHUR
 LINDSTROM; BERNIE JESTRABEK-HART;
 and JEANETTE ALGARME; on their own
 behalves and on behalf of others similarly situated,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.;
 BROOKDALE SENIOR LIVING
 COMMUNITIES, INC.; and DOES 1 through 100,
 Defendants.

Case No. 4:17-cv-03962-HSG

**[CORRECTED] STIPULATION AND
 ORDER DIRECTING LODGING OF
 CONFIDENTIAL DOCUMENT
 WITH COURT FOR IN CAMERA
 REVIEW**

Judge: Hon. Haywood S. Gilliam, Jr.

1 Plaintiffs and Defendants (collectively, the “Parties”), by their undersigned counsel,
2 stipulate as follows:

3 WHEREAS, the Parties have resolved all of Plaintiffs’ claims, through a Class Action
4 Settlement, submitted to the Court on March 17, 2025 with Plaintiffs’ Motion for Preliminary
5 Approval, ECF No. 1026, as well as through a confidential settlement agreement resolving
6 Plaintiffs’ individual claims;

7 WHEREAS, the Parties wish to provide the Court with a courtesy copy of the confidential
8 settlement agreement for the Court’s in camera review and reference;

9 WHEREAS, the Parties have agreed to keep the individual settlement agreement
10 confidential, except for select terms, and therefore do not consent to filing the document on the
11 public docket, even in a sealed or redacted form;

12 WHEREAS, the Parties provided a courtesy copy of the document by email to the Court’s
13 courtroom deputy on March 17, 2025 at 3:49 p.m., but understand that the document may not be
14 provided to the Court without an order so directing;

15 THEREFORE, the Parties request that the Court direct the courtroom deputy to provide the
16 document to the Court for in camera review.

17 IT IS SO STIPULATED.

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19 DATED: March 18, 2025

Respectfully submitted,

20 ROSEN BIEN GALVAN & GRUNFELD LLP

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22 By: /s/ Jenny S. Yelin
Jenny S. Yelin

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24 Attorneys for Plaintiffs and the Certified Subclasses
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Respectfully submitted,

DATED: March 18, 2025

MOORE & LEE, P.C.

By: /s/Erica Rutner

Erica Rutner


Attorneys for Defendants

ORDER

The Parties' Stipulation is granted, and the Court directs the Courtroom Deputy to forward the confidential agreement received via e-mail on March 17, 2025 at 3:49 p.m. to the Court for in-camera review.

IT IS SO ORDERED.

DATED: 3/19/2025



Honorable Haywood S. Gilliam, Jr.
United States District Judge